

4-19-02
12-3-8 v-8



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

P.O. Box 47600 • Olympia, Washington 98504-7600
(360) 407-6000 • TDD Only (Hearing Impaired) (360) 407-6006

April 19, 2002

Gerald Brown, S&E Manager
Ash Grove Cement Company
3801 E Marginal Way S
Seattle, WA 98134-1147

Dear Gerald Brown:

The purpose of this letter and the enclosed information is to ensure that you are aware of the requirements for preparing pollution prevention plans and associated fees as outlined in Chapters 173-305 and 307 of the Washington Administrative Code (WAC). These regulations require preparation of a plan for the voluntary reduction of hazardous waste generation and hazardous substance use. In addition, they call for a payment of a hazardous waste planning fee. **Our records indicate that your company/facility is subject to this legislation.**

The notice is for the following location: WAD009249616

Ash Grove Cement Company
3801 E Marginal Way S
Seattle, WA 98134-1147

The plans for hazardous waste and hazardous substance use reduction, referred to as "pollution prevention plans," have staggered submittal dates depending upon the quantity of hazardous wastes generated each year, and when, or if, a hazardous substance user is required to report toxic emissions. Because our records show your company/facility either generates over 2,640 pounds of hazardous waste annually, and/or is required to report under Section 313 of the Emergency Planning and Community Right to Know Act (EPCRA), **the due date for your pollution prevention plan is September 1, 2003. You may also be subject to an annual hazardous waste planning fee, which is due July 1, 2002.**

The information used for this determination was the Dangerous Waste Annual Report that you submitted for the calendar year 2000, and/or the Form R (Toxics Release Inventory) information also submitted for calendar year 2000, in compliance with EPCRA. If you think the information is incorrect, contact Holly Sullivan in Olympia at (360) 407-6733 for a review of your reports.

Information on the planning fee is contained in the enclosed focus sheet. The billing for the fee, if applicable to you, will be sent to you separately in mid-April. It will explain how the fee is calculated and provide information on the payment process.

Chapter 173-307 WAC includes a provision for "interrelated facilities." A person that owns or operates multiple facilities where a significant majority of the processes are substantially similar may qualify for Interrelated Facility (IRF) status and prepare a single plan. Furthermore, a person that develops covering more than one facility is assessed a single fee. It may be advantageous to use this provision if it applies to you.

USEPA SF



1274755

If you have two or more facilities that are required to prepare plans and think you might qualify for the single plan/single fee provision, contact the appropriate Ecology office listed below. Staff will help you assess your IRF potential and provide you with guidelines for documenting the information needed for a final determination. If you prefer notification by e-mail, please notify your regional contact by e-mail.

The Department of Ecology will provide technical assistance during your plan preparation. Our assistance is NOT enforcement-oriented. A manual called "Pollution Prevention Planning Guidance Manual" is available which leads you step-by-step through the planning and data gathering process. Staff are also available in our regional offices to provide information and answers to your questions. Workshops, personalized visits to your site, or other training opportunities will also be conducted to give you as much assistance as possible. We will notify you of dates and locations of training opportunities.

Approximately 700 Washington facilities have participated in Pollution Prevention Planning. It is a pleasure to report that many facilities are realizing benefits from implementing their identified pollution prevention opportunities. Increased worker safety, reduced compliance and liability costs, being a good neighbor, and direct savings from reduced chemical use and waste disposal costs are some examples of benefits that can be realized. I am confident that you, too, will find this pollution prevention program advantageous.

If you want additional information or immediate assistance in reducing waste, please contact the appropriate regional office listed below. A map is enclosed to help you identify the regional office that serves your area.

Northwest Regional Office
Department of Ecology
3190 160th Avenue SE
Bellevue, WA 98008-5452
Dennis Johnson
(425) 649-7040
djoh461@ecy.wa.gov

Eastern Regional Office
Department of Ecology
N 4601 Monroe, Suite 100
Spokane, WA 99205-5301
Camille Martin
(509) 456-6369
cafr461@ecy.wa.gov

Southwest Regional Office
Department of Ecology
PO box 47775
Olympia, WA 98504-7600
Hugh O'Neill
(360) 407-6354
hone461@ecy6.wa.gov

Central Regional Office
Department of Ecology
15 West Yakima Avenue Suite 200
Yakima, WA 98902-3401
Brian Dick
(509) 454-7659
bdic461@ecy.wa.gov

Sincerely,



Greg Sorlie, Manager
Hazardous Waste and Toxics Reduction Program

Enclosures